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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Plaintiff,

Defendants.

EMPLOYBRIDGE SOUTHWEST, LLC d/b/a

PROLOGISTIX, a Foreign Limited-Liability

Corporation; and, TESLA MOTORS, INC., a

ENTITIES 1-10; DOE INDIVIDUALS 1-10.

Company; THYSSENKRUPP SUPPLY

Foreign Corporation; DOE BUSINESS

CHAIN SERVICES NA, INC., a Foreign

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VS.

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ROBERT THURMAN-SILVA, an individual, CASE NO: 3:19-cv-683-LRH-WGC

STIPULATION AND ORDER ENLARGING TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT THYSSENKRUPP MATERIALS NA, INC.'S MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT (ECF No. 011)

(Second Request)

Plaintiff Robert Thurman-Silva ("Plaintiff") and Defendants thyssenkrupp Supply Chain Services NA, Inc., thyssenkrupp Materials NA, Inc., and Tesla, Inc., by and through their undersigned counsel of record hereby stipulate that Plaintiff may have a one (1)-week extension of time, through and including Monday, April 27, 2020, to file their opposition to Defendant thyssenkrupp Materials NA, Inc.'s Motion to Dismiss Plaintiffs' First Amended Complaint (ECF No. 011). Pursuant to this stipulation, the parties hereby request that the Court grant this enlargement of time. This is the second request for such an extension. Plaintiff's first request for an extension of time was filed on April 13, 2020 (ECF No. 16) and was granted on April 14, 2020 (ECF No. 18). The reason that Plaintiff now requests additional time to file this opposition brief is based upon Plaintiff's counsel's workload and

¹ Defendant Tesla, Inc. is erroneously identified as Tesla Motors, Inc.

Case 3:19-cv-00683-LRH-WGC Document 24 Filed 04/21/20 Page 2 of 2

1	calendar issues. This stipulation and request are made in good faith and not for any dilatory or
2	improper purpose.
3	DATED this 20 th day of April, 2020. THE GEDDES LAW FIRM, P.C.
4	Ka Cara
5	Kristen R. Geddes
6	Nevada Bar No. 9027 1575 Delucchi Lane, Suite 206
7	Reno, Nevada 89502 Phone: (775) 853-9455
8	Email: Kristen@TheGeddesLawFirm.com Attorneys for Plaintiff Robert Thurman-Silva
9	
10	DATED this <u>20th</u> day of April, 2020. Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
11	/s/
12	Antony Martin, Esq. Nevada Bar No. 8177
13	Dana Salmonson, Esq. Nevada Bar No. 11180
14	Wells Faro Tower Suite 1500
15	3800 Howards Hughes Parkway Las Vegas, NV 89169
16	Attorneys for Defendants thyssenkrupp Materials NA, Inc., thyssenkrupp Supply
17	Chain Services NA, Inc., and Tesla, Inc.
18	
19	ORDER
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21	Dated: April 21, 2020 IT IS SO ORDERED, nunc pro tunc.
22	1,1-,
23	H/Msha.
24	LARRY R. HICKS
25	UNITED STATES DISTRICT JUDGE
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